5.0 Public Participation

Contents:

5.1 Introduction

Public participation is a vitally important element of long-term planning for CSO controls. The City of Indianapolis feels strongly that citizen input should help guide decision-making because citizens will both enjoy the benefits of improved water quality and pay the costs associated with controlling CSOs and other wastewater-related pollution sources. This section describes how Indianapolis's combined city-county government works and who is involved in the final CSO control decisions. It also describes the state and federal requirements for obtaining and incorporating public input into a city's long-term CSO control plan. It summarizes public participation activities conducted by the city, and contains recommendations of the Raw Sewage Overflow Advisory Committee appointed by Mayor Bart Peterson.

For additional information, see the city's Web site at www.indygov.org/dpw/cso or www.indycleanstreams.org.

5.2 City-County Government

5.2.1 Formation of Unigov

On January 1, 1970, state law allowed the City of Indianapolis to expand its boundaries to include all of Marion County, creating a unified city-county government. The 1970 law increased the Indianapolis population by approximately 50 percent. Unigov also expanded the city's tax base and endowed the consolidated city with powers and functions formerly scattered among various city and county officials and a multitude of departments, agencies, boards, and commissions.

The cities of Beech Grove, Lawrence, Southport, and the Town of Speedway were not included in Unigov. These cities elect their own mayors, councils, and boards. However, as residents of Marion County, the residents of the "excluded cities" are obligated to pay countywide taxes. Due to the countywide taxing issue and the fact that the Indianapolis mayor's authority extends to the entire county, the residents of those four "excluded cities" can vote for the mayor of Indianapolis, a City-County Council member, and the four at-large council members.

Speedway treats sewage with its own wastewater treatment plant. Beech Grove, Lawrence and Southport, as well as some small communities outside Marion County, send their wastewater to Indianapolis under existing agreements between the governments.

5.2.2 CSO Decision Makers

The Indianapolis Department of Public Works (DPW) has responsibility for wastewater management and the quality of Indianapolis waterways. DPW is responsible for monitoring conditions of the county's infrastructure, which includes stormwater structures and sewers as well as streets and bridges. DPW also oversees any major repairs, reconstruction, or new construction of these facilities. The department is responsible for maintaining the city's infrastructure, including sewers, and overseeing United Water, the private company that operates the city's two wastewater treatment facilities. The DPW director is appointed by the Mayor and confirmed by the City-County Council. He and his staff will advise the Mayor and the council on the city's options for long-term CSO controls.

The Board of Public Works oversees DPW operations. This board consists of seven appointed members and the director of the department. The board reviews the department budget, holds any hearings required by law, and approves the awarding of contracts. It usually meets twice a month. Current members are:

- Kumar Menon, DPW Director (Chair)
- Kip Tew
- Richard Rowley
- Roger Brown
- Clarence Crain
- Sue Schalk
- Gregory Taylor

The City-County Council has exclusive power to adopt budgets, levy taxes, and appropriate money to city departments. The council can enact, repeal, or amend local laws. Long-term control plan alternatives that require legislative or fiscal action would have to be approved by the council. The council has a Public Works Committee that oversees DPW operations. The full council, upon committee recommendation, must approve the department's budget.

5.3 State and Federal Requirements

The U.S. Environmental Protection Agency's 1994 CSO strategy and subsequent guidelines emphasize that the public should be informed about CSO control alternatives before the city selects the specific CSO controls in its long-term control plan. These guidelines suggest the use of public meetings, advisory groups, public education, and other tools to educate and involve the public in water quality decisions. "The extent to which each type of control measure is utilized with each alternative can be based on public input. The implementation schedule and method of financing can also be selected or modified based on public input," says EPA's *Combined Sewer Overflows: Guidance for Long-Term Control Plan.* The guidance also recommends a number of public informational meetings leading up to at least one formal public hearing at which public comments, questions, and responses are recorded.

Public participation also is emphasized in IDEM's April 1996 *Amended Combined Sewer Overflow Strategy* and September 2001 Combined Sewer Overflow Long Term Control Plan and Use Attainability Analysis Guidance Document. The guidance recommends that CSO communities implement a public participation program that includes citizen advisory committees, public meetings and hearings, public education and involvement, and community notification of overflow events, as required by P.L.140-2000 Sec. 23 (c).

5.4 Public Participation Process and Methods

Since the late 1990s, the City of Indianapolis has conducted extensive public outreach programs to involve citizens in the review and development of alternatives for controlling combined sewer overflows. This outreach has been conducted in the following phases:

- **Phase I:** Formation of the Wet Weather Technical Advisory Committee (1996). This committee is composed of technical experts and community activists with an interest in water quality and wet-weather issues. It has provided continuing involvement of key stakeholders and professionals in the city's analysis of stream conditions and control alternatives.

- **Phase II:** Formation of Mayor's Raw Sewage Overflow Advisory Committee and public education/input sessions (2000). The mayor's committee is composed of a broad cross-section of the community, including business leaders, environmental activists, neighborhood representatives, and representatives of legal, financial, engineering, construction, labor and other professions. It guided the city as it conducted an extensive series of public education meetings in 2000, followed by public input sessions throughout the community. The committee analyzed the input received and provided recommendations to the mayor on how to proceed in developing the long-term control plan.

- **Phase III:** Publication of draft long-term control plan and 30-day public comment period and public hearing (2001). The city's draft plan was distributed widely in the community and comments were accepted in writing, via the city's Web site or telephone hotline, and at a public hearing.

- **Phase IV:** Stream use survey and neighborhood outreach meetings to identify ways in which residents use CSO-impacted waterways in Marion County (2002). The city conducted non-random intercept surveys followed by neighborhood meetings to collect information from stream corridor users, neighborhood leaders and environmental and recreational groups.

- **Phase V:** Creation of the Indianapolis Clean Stream Team public outreach and education program (2003). This comprehensive outreach program is designed to build public support and understanding of CSO and other water quality issues. The program has developed program fact sheets, PowerPoint presentations for neighborhood meetings, a newsletter, neighborhood signage for construction sites, and has organized two media events to showcase CSO early action projects. The city also provides an urban water education curriculum and classroom assistance to three middle schools in the Indianapolis Public Schools system.

- **Phase VI:** Implementation of outreach activities on the revised long-term control plan, including: continuing the involvement of advisory committee members, building general community awareness of the issues, hosting watershed-based education/input sessions,

documenting public input and incorporating it into the city's plan, and a offering 30-day comment period on the draft recommended plan.

5.5 Advisory Committees

The City of Indianapolis formed two committees to advise the city on combined sewer overflow issues: the Wet Weather Technical Advisory Committee and the Mayor's Raw Sewage Overflow Advisory Committee. In 2002, the committees were merged into one committee, now called the Clean Stream Team Advisory Committee, to provide unified advice and public input.

5.5.1 Wet Weather Technical Advisory Committee

In 1996, the city formed a Wet Weather Technical Advisory Committee to serve two purposes. First, it provided independent technical advice and expertise as the city and its consulting engineers conducted studies and prepared models to support long-term CSO control planning. Second, it provided a public forum in which city staff could report progress during the early stages of CSO control planning and obtain feedback on other wet-weather-related issues.

Over the years, committee members included:

- **Merri Anderson**, Marion County Alliance of Neighborhood Associations
- **William Beranek Jr.**, Ph.D., Indiana Environmental Institute Inc.
- **Eli Bloom**
- **Beulah Coughenour,** City-County Council
- **Dr. Charles Crawford,** U.S. Geological Survey
- **Pete Drum**
- **Ken Crichton,** Eli Lilly & Co.
- **Sue McCaffrey,** Indianapolis Chamber of Commerce
- **David Voelker**, U.S. Geological Survey
- **John Kupke**, P.E., HNTB Corp.
- **Glenn Pratt**, environmental consultant
- **Ralph E. Roper, Jr.**, Ph.D., P.E., Heritage Environmental Services, LLC
- **Richard M. Van Frank**, Audubon Society
- **Phyllis Zimmerman**, Sierra Club
- **Pam Thevenow**, Marion County Health Department

Committee meetings have addressed the following CSO-related topics: *E. coli* stream monitoring, flow characterization, sewer system modeling, water quality modeling, treatment plant alternatives, CSO abatement technologies, stream reach characterization and evaluation, LTCP options and costs, and public participation on developing the long-term control plan. In addition, the committee has provided a forum for discussing state and federal policies and legislation, stormwater master planning, Barrett Law programs to sewer unsewered areas, zoning for floodplains, review of U.S. EPA and IDEM comments on the 2001 LTCP, and public education on wet-weather issues. Minutes from advisory group meetings since September 2000 are included in **Appendix D**.

5.5.2 Mayor's Raw Sewage Overflow Advisory Committee

On July 24, 2000, Mayor Peterson appointed an advisory committee to help gather public input on the sewage overflow problem. The purpose of the committee was to:

1. Review the consultants' report on the city's options for controlling combined sewer overflows and improving water quality in Indianapolis
2. Review opinions and feedback received from Marion County residents during a three-month public participation process
3. Advise the mayor on how the city should proceed in developing a long-term control plan for combined sewer overflows

The committee included neighborhood representatives and business leaders, as well as individuals with expertise in accounting, environmental law, engineering, and geology. Original members of the committee were:

- **Merri Anderson**, Marion County Alliance of Neighborhood Associations;
- **Leon Bates**, Mapleton-Fall Creek Neighborhood Association;
- **Bob Bowen**, CEO, Bowen Engineering;
- **Thomas Cobb**, attorney and utility law judge, Indiana Utility Regulatory Commission;
- **Dennis Charles**, accountant, John J. Madden & Co.;

- **Daniel Fugate**, chairman, Westside Cooperative Organization;
- **Stu Grauel**, Indianapolis Power & Light;
- **Bruce Jacobs**, president, Near Eastside Community Organization;
- **Donald Murray**, facilities management, Eli Lilly & Co.;
- **John S. Myrland**, president, Indianapolis Chamber of Commerce;
- **Mark Sneathen**, project engineer, RQAW Corp.;
- **Kevin Strunk**, president/geologist, Wabash Resources & Consulting; and
- **Phyllis Zimmerman**, Sierra Club.

The Mayor's Raw Sewage Overflow Advisory Committee met six times between July 24 and November 15, 2000. The committee also formed subcommittees on sensitive areas and level of control, which each met once to develop recommendations in specific areas. The committee advised the city and its consultants on the public participation process, and reviewed and discussed public comments collected during the public education and input sessions. A number of committee members also attended an optional tour of the city's wastewater treatment plant, CSO receiving streams, and CSO technologies undergoing pilot testing. During their meetings, the committee also discussed or reviewed information on the following issues: conditions of the existing sewer system, other cities' CSO programs, other communities receiving sewage treatment services from Indianapolis, the Chicago CSO tunnel project, the septic conversion program, stormwater master plan, and EPA's Section 308 request to the city. The committee also reviewed information on the city's financial capability assessment and costs associated with the different CSO control alternatives. Copies of the Mayor's Raw Sewage Overflow Advisory Committee meeting minutes are included in **Appendix D**.

5.5.3 Clean Stream Team Advisory Committee

Interested members of the Wet Weather Technical Advisory Committee and the Mayor's Raw Sewage Overflow Advisory Committee were combined in 2002 to create the Clean Stream Team Advisory Committee. Current active members are:

- William Beranek Jr.
- David Voelker
- Richard Van Frank
- Vincent J. Parker
- Glenn Pratt
- Sandhya Markand
- John Kupke
- Kevin Hardie
- Kevin Strunk
- Leon Bates
- Merri Anderson
- Pam Thevenow
- Phyllis Zimmerman
- Ralph E. Roper Jr.

Copies of meeting minutes are located in Appendix D.

5.6 Public Education Activities

The city believes that public education is necessary to inform citizens about CSOs, their impacts, and government efforts to address those impacts. Therefore, the city has developed a comprehensive program designed to educate citizens; seek public input; inform neighborhoods about construction projects; notify residents of overflow events; and report on the city's progress in reducing sewage overflows and improving water quality.

5.6.1 WaterWise Campaign

During early planning and study of combined sewer overflows in Indianapolis, the city instituted a wet-weather public education effort, known as the "WaterWise Campaign." The program's goals were to:

- Inform citizens of wet-weather pollution impacts and controls, including the effects of combined sewer overflows, sanitary sewer overflows, and other pollution sources such as non-point runoff
- Involve citizens in the solution by educating citizens on how they can help and obtaining their input on how funds should best be utilized

The WaterWise program used educational videos, brochures, sewer bill inserts, media kits and a Web site (www.indygov.org/dpw/waterwise) to educate citizens about wet-weather issues. Educational topics included citizen activities to protect water quality, combined sewer overflows, disconnecting downspouts from sanitary sewers, and how to adopt a neighborhood stream.

The city also conducted a baseline awareness survey in April 1999 to determine public awareness of wet-weather

issues and attitudes toward funding or supporting water quality improvement projects. The telephone survey was administered to 418 Indianapolis home dwellers by the Public Opinion Laboratory at Indiana University-Purdue University at Indianapolis.

5.6.2 Public Notification Program

In response to requests from the public, the City of Indianapolis developed a CSO public notification program in 2002. This program was the first of its kind in the state and was implemented prior to the Water Pollution Control Board's passage of a rule requiring such programs in all CSO communities. The overall objectives and goals of the City of Indianapolis' CSO Public Notification Program are to:

- Notify affected and interested persons when sewage overflows are likely to occur
- Educate affected and interested persons as to the health hazards and impacts associated with sewage in our waterways
- Enable affected and interested persons to take the appropriate steps to protect themselves from hazards associated with sewage in waterways
- Comply with 327 IAC 5-2.1 (Combined Sewer Overflow Public Notification Rule)

The program includes daily monitoring of weather reports, e-mail notification, a telephone hotline and reports to IDEM on monthly Discharge Monitoring Reports.

In addition, the city and the Marion County Health Department have installed warning signs at all CSO outfalls and at public access points to the waterways. The public access signs warn citizens of sewage pollution and that swimming and wading are not permitted. These signs contain both English and Spanish messages as well as universal symbols. The CSO outfall signs ask citizens to notify the Mayor's Action Center if there is any flow from the outfall during dry weather.

5.6.3 Clean Stream Team Outreach and Education Program

The Clean Stream Team's outreach and education program is designed to build public support and understanding of CSO and other water quality issues. The program utilizes a variety of methods and materials to inform citizens about progress toward addressing raw sewage overflows. Activities have included program and project fact sheets, PowerPoint presentations for neighborhood meetings, a quarterly newsletter distributed to more than 1,500 people, neighborhood signage for construction sites, and media events to showcase CSO early action projects. Samples of outreach materials can be found in **Appendix D**.

5.6.4 Middle School Water Education Program

DPW and the Indianapolis Clean Stream Team launched a middle school water education program during the 2003-4 school year in three Indianapolis Public Schools middle schools: Harshman, John Marshall and McFarland.

Initially, the city used a curriculum and Team WET Schools program developed by the Council for Environmental Education in Houston, Texas. The program works with teachers to incorporate urban water education into science, social studies, history and other subjects. The activities promote learning about a range of water issues, from ecology and pollution prevention to wastewater treatment and water stewardship.

The schools were chosen because of their interest in the program and their focus on science and the environment. John Marshall and McFarland Middle Schools have Environmental Science Academy magnet programs, which focus on water issues for a significant portion of the year. Harshman Middle School has a science and technology magnet program and is located on the banks of Pogues Run, which has created a unique interest in clean water issues among the teachers.

A designation ceremony was held at John Marshall Middle School on September 29, 2003, to kick off the program. Mayor Bart Peterson, IPS School Board Vice President Dr. Mary Busch and Principal Jamyce Banks participated in the event, as well as many student volunteers.

Two training sessions for teachers were provided on October 7 and 9, 2003. On October 7, seven teachers were trained at Harshman Middle School from a diverse cross-section of subject areas: Special Education, Science, Title I, Language Arts and Mathematics. At John Marshall on October 9, three teachers were trained from each of the remaining two schools, John Marshall and McFarland. All but one of the teachers trained at John Marshall were science teachers, with one reading teacher.

The Council for Environmental Education (CEE) worked with a consultant from IPS to map the WET in the City

curriculum and activities to Indiana state academic standards. At the training sessions, the IPS consultant spoke about how these activities support their standard-based curriculum. CEE presented abbreviated versions of several activities, in which teachers participated, and teachers prepared and presented their own activities in the afternoon. Evaluations were received, and comments were very positive overall.

In 2005, the city decided to convert the WET in the City program to the State of Indiana Project WET program in the same middle schools. Volunteers from the Indianapolis Clean Stream Team, Department of Public Works and area engineering firms have been identified to support the schools and provide teacher training. Teachers can request volunteers as needed to support their classroom activities.

5.7 2000-2001 Public Participation Activities

5.7.1 Release of July 2000 CSO Report

On July 11, 2000, Indianapolis Mayor Bart Peterson held a press conference along Pleasant Run to release a comprehensive report on the city's CSO problems: *Improving Our Streams in the City of Indianapolis: A Report on Options for Controlling Combined Sewer Overflows*. The report represented seven years of research conducted by the city Departments of Public Works and Capital Asset Management (DCAM) and a team of consultants. It was designed to present scientific and technical information in a readable and understandable format, so any interested Indianapolis citizen could participate in the decision-making. The mayor also announced plans to form an advisory committee to review the report and make recommendations to the city. He released a schedule of upcoming public education meetings, public input sessions, and advisory committee meetings. The press conference was covered by all local news media outlets, including the Indianapolis Star; television stations WRTV, WISH, WTHR, and WXIN; radio station WIBC; and other news organizations. Press clippings associated with this announcement can be found in *City of Indianapolis Combined Sewer Overflow Long-Term Control Planning: Summary of Public Education Sessions*. (See **Appendix D** of this report.)

In addition, the report was distributed to the 25 Indianapolis-Marion County public libraries and the following organizations: Indiana Chamber of Commerce, Marion County Health Department, City-County Council, DPW-DCAM Board, Friends of the White River, Indiana Environmental Institute, Improving Kids Environment, Hoosier Environmental Council, Audubon Society, Congresswoman Julia Carson, U.S. Geological Survey, Indiana Department of Environmental Management, Indiana House of Representatives, Indiana Senate, and the School of Public and Environmental Affairs at Indiana University-Purdue University at Indianapolis.

The city used three methods to provide citizens easy access to information on the combined sewer overflow issue: public libraries, a Web site, and a dedicated telephone hotline. Copies of the city's study and the public meeting schedule were placed in Indianapolis-Marion County Public Library branches. In addition, the city created a special Web site (www.indygov.org/dpw/cso) for accessing information on sewer overflows. The Web site included: a downloadable copy of the CSO report, a downloadable copy of the CSO issues booklet, public meeting dates and times, related links to the U.S. Environmental Protection Agency and Indiana Department of Environmental Management, and a feedback form for citizen comments and questions. The telephone hotline (317-706-2622) included recorded messages with the dates, times and locations of upcoming public meetings, as well as how to obtain written materials on the sewage overflow issue. Citizens also could leave recorded comments or questions on the hotline.

5.7.2 July 2000 Public Education Meetings

From July 24-31, 2000, the city hosted six public education meetings throughout Marion County to explain the options outlined in the consultants' report and to answer citizens' questions. Meeting sites were selected to ensure that most Marion County residents were within a 15- or 20-minute drive of at least one meeting location.

Meetings were advertised in two press releases from the mayor's office, on government cable Channel 16's calendar of events, as well in a mailing to 600 neighborhood associations, environmental groups, organizations, and elected officials, including state legislators and township assessors and trustees. Mailings also were sent to officials in the excluded cities of Lawrence, Beech Grove and Greenwood, who receive sewage treatment services from the City of Indianapolis. The city also included CSO information in quarterly sewer bill inserts sent to 240,000 residents during July and August. The inserts included a reference to the Web site and telephone number, where a schedule of meetings was available. Meetings were publicized in *The Indianapolis Star*, local television and radio newscasts, and smaller neighborhood newspapers.

In all, 164 citizens attended the education sessions. In order to reach even more citizens, the July 25 CSO education meeting was taped by city-owned cable Channel 16, WCTY-TV, which reaches 250,000 households in Marion County. The session was rebroadcast in its entirety 33 times between July 27 and August 9, 2000. Videotapes of the education session also were mailed to 99 neighborhood associations in Marion County.

5.7.3 August 2000 Public Input Meetings

Following the July education sessions, the city hosted five facilitated public input sessions during August 2000 to collect citizen feedback on the issues and options identified for fighting sewage overflows. The August 21 meeting was taped by Channel 16, WCTY-TV and televised on the city's cable television stations numerous times during the months of August and September. The telecasts included references to the city's Web site and telephone number.

Additional information on the public education and input sessions, including comments recorded at each meeting, can be found in *City of Indianapolis Combined Sewer Overflow Long-Term Control Planning: Summary of Public Education Sessions*, and *City of Indianapolis Combined Sewer Overflow Long-Term Control Planning: Summary of Public Input Sessions*, both located in **Appendix D** of this report.

5.7.4 Advisory Committee Recommendations

After reviewing public input and information provided by the city, the Mayor's Raw Sewage Overflow Advisory Committee offered the following recommendations:

A. Overall Recommendations

1. The long-term control plan should be designed to achieve the greatest benefits to the health of Indianapolis citizens, and also should address the needs identified by citizens and the CSO Advisory Committee, within the constraints of state and federal law. The city should try to complete the overall project in less than 20 years.
2. The city should take a holistic approach to improving water quality in Indianapolis, addressing sewage overflows, septic systems, stormwater and other issues as part of a watershed-based plan. The plan should consider all factors that contribute to contamination, and optimize various pollution reduction projects to achieve the greatest improvement in water quality and human health.
3. Financing for the long-term control plan and other options should be fair and equitable.

B. Priority Areas

1. The tributaries are a higher scheduling priority than White River.
2. The city should place highest scheduling priority on areas where people, especially children, come in contact with a stream. This would include placing the highest priority on stream segments along parks, wading areas used by children, and adjacent to school properties. The next priority is designated greenways, followed by stream segments adjacent to neighborhoods, followed by popular fishing holes.
3. In determining where to start the work, the city should select the watershed where projects would have the most impact for the greatest number of people.
4. In prioritizing the solutions within each watershed, the city should select the most practical and cost effective options first. In other words, begin with solutions that achieve "the biggest bang for our buck." In some instances, the city may want to place a higher priority on eliminating outfalls that are most upstream.
5. The city should address sewage overflows on several fronts at once. For example, if the engineering and construction work necessary to address a heavily contaminated section of a stream is long and involved, the city should pursue planning and engineering on that section while constructing improvements in another location that requires a less complicated solution.
6. The city also should consider the status of projects already underway and work to finish them as quickly as possible

C. Level of Control

1. The city should select CSO control targets to achieve maximum environmental and human health benefits in an affordable and technically sound manner.
2. The city should develop better information comparing the benefits of sewage overflow controls to stormwater and septic system controls.

D. Other Options for Improving Water Quality

1. The city should accelerate the conversion of septic systems to sewers. At the same time, the city should aggressively seek legislative improvements or other alternatives to the Barrett Law process.

2. The city should revisit the idea of creating a stormwater utility to fund stormwater control projects, but should improve land use and zoning practices to prevent the utility from funding undesirable development.

3. The reclamation facility along Fall Creek is an important solution for cleaning Fall Creek. In developing a strategy for Fall Creek, the city should first select (with citizen input) a location for the reclamation facility that would make the most positive impact on the stream, then determine what storage methods and facilities are needed to supplement the benefits of the reclamation facility, followed by additional processes and practices to improve Fall Creek's water quality.

4. The city should seriously consider the problems that may exist in installing real-time controls in very old sewer pipes that may not be able to handle the pressure from sewage pressing against the pipe walls.

5. In addition to addressing bacteria and dissolved oxygen problems, the city should improve erosion control by enforcing existing laws and programs.

E. Neighborhood Concerns

1. The city should hold public meetings in neighborhoods to get input from citizens and business owners who will be affected by construction projects. Before setting meeting dates, the city should contact neighborhood associations to avoid conflicts with other meetings or events that will attract many neighborhood citizens. When practical, use existing neighborhood association meetings to keep citizens informed.

2. After meeting dates are established, the city should use flyers, door hangers, street signs, the news media, and other methods to announce the location, time and topic of the meeting at least two weeks in advance. The city also should notify neighborhood association presidents, City-County Councilors, and ward and precinct committee chairs via postcard or e-mail, four to six weeks in advance, if possible.

3. During facility planning, the city should present options to the neighborhood; be prepared to explain the costs and benefits; be honest about any drawbacks; and provide opportunities for citizens to see similar facilities already built elsewhere.

4. During construction, the city should provide a mechanism to raise issues and problems, such as providing a contact name and phone number or creating an advisory committee that includes the contractor, city and community representatives. The city should work to maintain access to businesses and institutions, minimize disruption, and keep the neighborhood informed throughout the project.

5. Any new facilities or structures must be "neighborhood friendly." Specifically, they should look attractive, blend into the neighborhood, minimize odors, and limit noise and lighting. Before introducing an idea to a neighborhood, city staff should ask, "Would we want this facility/structure next to our house?"

F. Building Community Support

1. The city should develop an aggressive marketing campaign designed to build public confidence through ongoing, timely and accurate information about the CSO project. The campaign could include a website, speakers bureau, partnerships with radio and television stations, public education materials, public service announcements and other marketing tools.

2. The project needs a carefully designed message identifying sewage overflows as a serious problem that we all share, with affordable solutions that have broad community support. The campaign should communicate the impact on sewer user fees, including comparing Indianapolis's rates to other cities' rates. The campaign also should identify things individuals can do to reduce sewage overflows.

3. During implementation, the city should work with the business community, Marion County Health Department and others to raise awareness of sewage overflow issues and link the project's benefits to improved economic development and quality of life.

5.7.5 Public Comment on 2001 Draft LTCP

5.7.5.1 Public Comment Process

The City of Indianapolis provided a 31-day public comment period from Tuesday, March 13, 2001, to Thursday April 12, 2001, to allow for public review and comment on the plan. The city issued a press release and used the local

news media and the city's Web site to publicize the availability of the plan. Comments were accepted both verbally through a public hearing and in writing, via standard mail or e-mail. The city also met with the Wet Weather Technical Advisory Committee to discuss the plan and take their comments. A summary of the public comment process, transcript of the public hearing, and copies of all written comments received are located in **Appendix D** of this report.

5.7.5.2 Major Issues Raised

The city received a wide variety of comments during the 2001 public comment period. The primary issues raised by citizens can be divided into the following general categories:

1. Ensuring a holistic watershed approach
2. Establishing higher or more rapid sewer user fee increases
3. Accelerating the time frame for completion
4. Increasing the combined sewage capture rate
5. Revising the affordability calculation
6. Revising the process used to convert septic systems to sewers
7. Addressing technical issues, such as a request for better data or additional study, elaboration on specific points, and corrections to factual errors.

The city issued the following responses to those issues following the 2001 public comment period:

Question/Comment: The City of Indianapolis should take a holistic, watershed approach to fixing the problem.

2001 Answer: The plan does take this into consideration, including projects to address combined sewer overflows, septic systems, and a portion of the pollution from stormwater runoff. Stormwater runoff and septic systems are two of the three major components that must be addressed to improve water quality in Indianapolis. The plan includes nearly $11 million to improve the stormwater system and $32 million to accelerate the septic conversion program from 60 years to 20 years. Each of these will supplement the work done to reduce combined sewer overflows in Marion County. Combined, they offer a cost-effective and affordable solution for improving water quality.

Question/Comment: The implementation schedule should be 10 years rather than 20.

2001 Answer: Based on an analysis of the financial capability of citizens, the city has determined the 20-year implementation plan would be the most prudent and affordable approach. Reducing the project time from 20 to 10 years would result in dramatically higher sewer user fees in the short-term, and would not allow for a gradual change in the monthly rates consumers pay. A ten-year timeframe would place undue hardship on all Marion County residents from an inconvenience standpoint and would increase sewer user fees at a much higher rate than desired. In addition, a 20-year timeframe allows for prudent facility planning, measured progress, and necessary adjustments as new technologies become available or control structures are put online and tested for effectiveness.

Question/Comment: The city should revise the Barrett Law process for converting septic systems to sewer service.

2001 Answer: The city received two types of comments on septic system conversions. Residents of areas currently on septic wanted the city to pay the entire cost of converting septic systems to sewer. Residents who had already converted to the sewer system at their own cost did not want to subsidize someone else's septic conversion costs. The city estimates the cost of providing sewer service to 18,000 properties now on septic systems to be $300 million. Including the entire cost of converting these systems to the sanitary sewer system would increase the cost of the long-term control plan by nearly one third. For nearly 100 years under the Barrett Law, property owners realizing improvements such as sanitary sewers in their neighborhoods have been responsible for paying their portion of the project. Obligating all Indianapolis residents to cover this cost would be unfair to property owners who have paid their fair share in the past, and would result in even higher sewer user fees across the board. However, the city has proposed changes to the Barrett Law process to make the payments more affordable and less burdensome on property owners. Instead of a 10-year loan with annual payments, the city is proposing a 20- or 30-year low-interest loan with monthly payments. The Board of Public Works has approved this plan.

Question/Comment: Affordability calculation should be based on all of Marion County, not just Center Township.

2001 Answer: In basing the financial capability assessment on Center Township, the City of Indianapolis was sensitive to the effects of higher sewer user fees on this portion of the city's residents. Center Township accounts for 22 percent of the homes in Marion County, but the me-

dian household income is far below that of the remaining eight townships within the county. Considering the entire county in determining the cost and affordability of the long-term control plan would place an excessive burden on the residents of Center Township and other low-income or fixed-income residents. Other communities, including Boston, Massachusetts, and Onodaga County, New York, have based their affordability analysis on low-income communities within the sewer service area. While Unigov united the nine Marion County townships into one city, it did not erase the economic disparities between the inner city and the surrounding suburbs. These factors must be taken into account in developing a plan that is affordable and fair.

Question/Comment: The 85 percent capture level is not enough. We should look to 92 or 96 percent capture to solve the problem.

2001 Answer: The higher the capture rate, the higher the cost. But simply looking at the overall cost of implementation of the long-term control plan is not enough. The city analyzed the cost per day of compliance and determined the 85 percent capture scenario provides us the best return for our dollar. Increasing the capture rate to 92 or 96 percent would increase the costs by fifty percent, but only provide a handful of days in improved compliance. Therefore, in order to keep costs to the ratepayers reasonable and to achieve the highest capture rate for the most affordable option, the City of Indianapolis chose the 85 percent capture rate in the 2001 long-term control plan.

Question/Comment: Ramp up the sewer user fee increase at a greater rate.

2001 Answer: The city has requested increasing sewer rates by approximately 17 percent, or $1.94 per month for the average residential user, during the first five years of the project. This rate increase will provide the funding necessary to design and begin construction on a wide variety of projects. Given the need for facility planning, bidding, and neighborhood communication, the city estimates it can spend no more than $185 million in the first five years of the project. Furthermore, the city's research indicates that Indianapolis residents already face an additional $10.25 per month in other fixed service and utility costs, such as electricity, natural gas, drinking water, and a potential stormwater utility fee. The city sees no benefit to burdening ratepayers with substantial sewer user fee increases that the city cannot spend right away. As the project moves forward, the city will ask for incremental increases in the sewer user fees as it can spend those additional revenues.

Question/Comment: The plan needs better data, additional study, additional elaboration, or factual corrections.

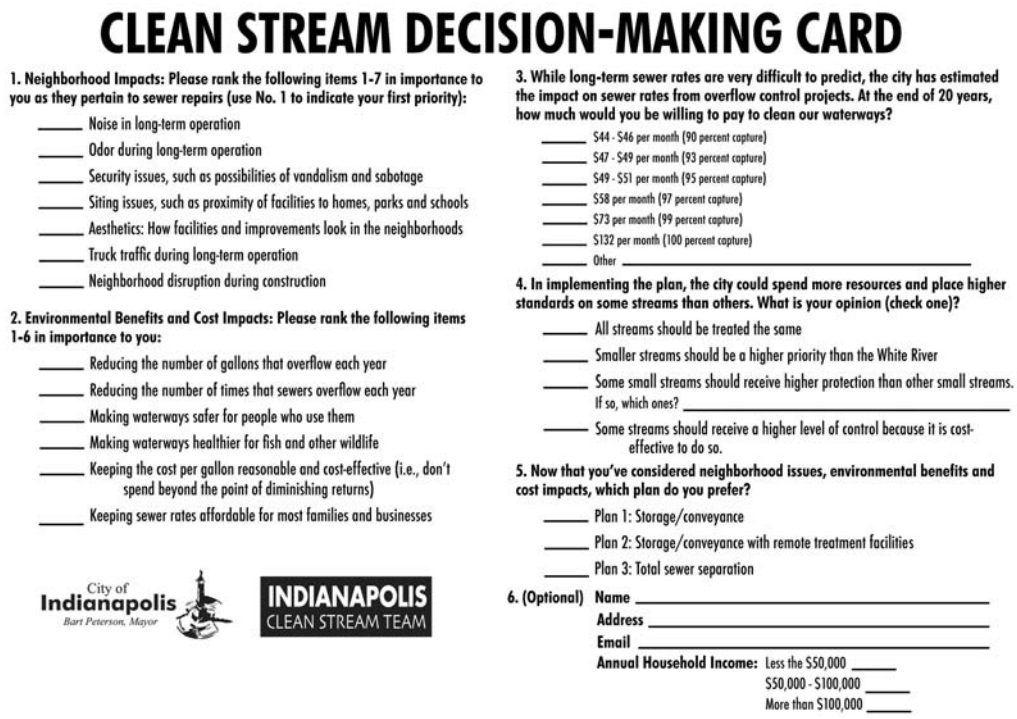
2001 Answer: The city received a number of technical comments from the Wet Weather Technical Advisory Committee. Where appropriate, these comments and factual corrections have been addressed in the plan. Because the long-term control plan is a continuing and evolving process, there will be many other opportunities for input and refinement as CSO controls are designed and constructed. However, the city does not believe that additional study is needed or warranted before finalizing the long-term control plan. In the past, the city was criticized for doing too much study and not moving forward to implement CSO control projects. The city has attempted to balance the need for sufficient and accurate information against the tendency to over-study a problem. We believe we have struck the right balance and can proceed with finalizing the plan and implementing water quality improvement projects. The city will continue to gather information during facility planning and incorporate new data into the final design of CSO control structures. Indianapolis is committed to the public participation process and will continue to incorporate public comments into the plan during the process.

5.8 2004 Outreach on LTCP Alternatives

5.8.1 General Community Outreach

Beginning in the spring of 2004, the city began conducting a general outreach program to raise community awareness about raw sewage overflows and to encourage people to attend public meetings, visit the Web site or otherwise get involved. This community outreach program was intended to give all community members an opportunity to provide input on the options for controlling raw sewage overflows and other pollution problems. Outreach methods included:

1. **Community Outreach/Speaker's Bureau:** Brief presentations on the CSO control issue and the opportunities for public input were provided to a number of community groups. These groups included the Marion County Alliance of Neighborhood Associations, Indianapolis Chamber of Commerce Infrastructure Committee, ACEC Indiana, Central Indiana Building Trades



CLEAN STREAM DECISION-MAKING CARD

1. Neighborhood Impacts: Please rank the following items 1-7 in importance to you as they pertain to sewer repairs (use No. 1 to indicate your first priority):

_____ Noise in long-term operation
_____ Odor during long-term operation
_____ Security issues, such as possibilities of vandalism and sabotage
_____ Siting issues, such as proximity of facilities to homes, parks and schools
_____ Aesthetics: How facilities and improvements look in the neighborhoods
_____ Truck traffic during long-term operation
_____ Neighborhood disruption during construction

2. Environmental Benefits and Cost Impacts: Please rank the following items 1-6 in importance to you:

_____ Reducing the number of gallons that overflow each year
_____ Reducing the number of times that sewers overflow each year
_____ Making waterways safer for people who use them
_____ Making waterways healthier for fish and other wildlife
_____ Keeping the cost per gallon reasonable and cost-effective (i.e., don't spend beyond the point of diminishing returns)
_____ Keeping sewer rates affordable for most families and businesses

City of Indianapolis
Bart Peterson, Mayor

INDIANAPOLIS CLEAN STREAM TEAM

3. While long-term sewer rates are very difficult to predict, the city has estimated the impact on sewer rates from overflow control projects. At the end of 20 years, how much would you be willing to pay to clean our waterways?

_____ $44 - $46 per month (90 percent capture)
_____ $47 - $49 per month (93 percent capture)
_____ $49 - $51 per month (95 percent capture)
_____ $58 per month (97 percent capture)
_____ $73 per month (99 percent capture)
_____ $132 per month (100 percent capture)
_____ Other _____

4. In implementing the plan, the city could spend more resources and place higher standards on some streams than others. What is your opinion (check one)?

_____ All streams should be treated the same
_____ Smaller streams should be a higher priority than the White River
_____ Some small streams should receive higher protection than other small streams. If so, which ones? _____
_____ Some streams should receive a higher level of control because it is cost-effective to do so.

5. Now that you've considered neighborhood issues, environmental benefits and cost impacts, which plan do you prefer?

_____ Plan 1: Storage/conveyance
_____ Plan 2: Storage/conveyance with remote treatment facilities
_____ Plan 3: Total sewer separation

6. (Optional) Name _____
Address _____
Email _____
Annual Household Income: Less the $50,000 _____
$50,000 - $100,000 _____
More than $100,000 _____

Figure 5-1
Stream Line Insert Card

Council, the Board of Public Works, the Public Works Committee of the City-County Council, the Sierra Club, and other organizations. The city and Clean Stream Team also staffed an educational booth at the Earth Day Indiana festival in April 2004.

2. **Educational Video**: An educational video was produced for use at community meetings and broadcast numerous times on the city-owned cable television station, WCTY's Government TV2. This 8-minute video provided information on the CSO problem, described city activities, and encourage public participation in the long-term control plan process.

3. **Media:** The Indianapolis Star reported on combined sewer overflow issues in a front-page story on Sunday, September 26, 2004.

5.8.2 Watershed Meetings

From October 14-26, the Department of Public Works and the Indianapolis Clean Stream Team hosted five public meetings throughout Marion County to collect citizen feedback on the long-term control plan options. Meeting sites were selected to ensure that most Marion County residents were within a 15- or 20-minute drive of at least one meeting location. The meeting locations were also targeted by watershed.

Meeting Promotion: The city actively promoted the public meetings through a number of communication methods. The centerpiece of the outreach effort was a special 12-page edition of the *Stream Line* newsletter, which included an insert card (**Figure 5-1**) on which citizens could register their opinions on key questions. The newsletter was mailed on October 12 and 13 to more than 1,400 people and e-mailed to more than 400. People who were unable to attend one of the meetings could get the same information and feedback opportunities through the newsletter or Web site. A copy of the newsletter is included in **Appendix D**.

Other methods used to promote the meetings included:

- WCTY-TV promoted the meetings on their televised community calendar. They also videotaped the first meeting and broadcast it 12 times between October 19th and 23rd, and 16 times between November 3rd and 8th.

- A press conference to celebrate the completion of the East Bank CSO storage tank and announce the watershed meetings was held on October 12 and attended by WIBC radio, WISH-TV and WRTV-6. A press release also was sent to local news media. All three stations and The Indianapolis Star ran stories and several included the indycleanstreams.org Web

site. A second story on potential rate increases related to the CSO control options also ran on October 21 in the Indianapolis Star.

- Hundreds of invitations were emailed to neighborhood groups, a DPW email list, Sierra Club members, Hoosier Canoe Club, CSO public notification list, industrial pretreatment permit holders, and companies and individuals on DPW's list of potential engineering and construction contractors. Each of those email lists likely generated relay emails to additional groups and individuals. The invitation is shown in **Figure 5-2**.
- More than 50 fliers promoting the meetings were distributed to DPW and Department of Metropolitan Development offices. The flier is shown in **Figure 5-3.**
- Fliers were sent to 23 Marion County libraries for posting to their community events boards.
- More than 250 fliers were posted at various locations (grocery stores, banks, coffee shops, etc.) throughout Marion County with a focus on areas near the meeting sites and along waterways.
- Display advertisements (shown in **Figure 5-4**) were placed in each of the following newspapers: Indiana Herald, Nuvo Weekly, New Palestine Press, Hendricks County Flyer, Westside Flyer, Westside Community News, Danville Republican, Mooresville/Decatur Times, Noblesville Ledger, Topics (North Central Edition), Greenwood Challenger, Southside Challenger, Zionsville Times-Sentinel, East Side Herald, Northeast Reporter, Franklin Township Informer, Southside Times, The Press, Indianapolis Recorder.
- The indycleanstreams.org Web site was updated with content from the special edition of the *Stream Line*. Public comment was accepted through the site as well. The updated Web site home page is shown in **Figure 5-5**.

The public meetings were held in the evening at the following locations:

Date	Location (No. of Attendees)
Oct. 14	Garfield Park Multipurpose Room (23)
Oct. 19	Julia Carson Government Center (9)
Oct. 21	Christamore House Auditorium (8)
Oct. 25	Brookside Park Auditorium (48)
Oct. 26	Riviera Club (52)

Information tables were available at each watershed meeting. They included:

- **Watershed Tables:** Five displays gave an overview of each major watershed: Fall Creek, Pleasant Run, Pogues Run, Eagle Creek and White River. Each display included a vicinity map of the watershed as well as photos to illustrate diversity in stream characteristics (flow, vegetation, etc.). A watershed notebook was available at each table that included physical stream characteristics maps, recreational use data, CSO control project fact sheets and other watershed-specific information. Recreational use survey data was also included for each specific watershed.
- **"Ask an Engineer" Table:** This table provided information to help citizens understand how CSO control facilities would be designed, constructed or operated. Technical information, including treatment plant information, water quality data and graphs were available, as well as photos of equipment and facilities. The staff at the table also had access to copies of EPA and IDEM correspondence to reference if needed.
- **General Information Table:** The educational trade show booth display was the key attraction at this table. Attendees could pick up program fact sheets, FAQ sheets and other information about the city's water quality programs. Attendees also could sign up to be added to the team's mailing list.
- **"Join the Team" Table:** Attendees could sign a pledge form to take action to reduce raw sewage overflows and receive a Clean Stream Team sticker, window cling or bumper sticker.

The public meeting included the educational video described earlier and a 90-minute PowerPoint presentation that followed the outline of the *Stream Line* newsletter. The presentation covered the following general topics:

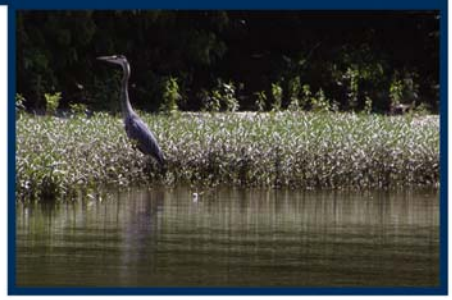
- **Background Information:** This portion of the presentation described the causes of sewer overflows; the scope of the problem nationally, in Indiana and in Indianapolis; the frequency of overflows and number of gallons that overflow in an average year; waterways affected; *E. coli* bacteria levels upstream and downstream of the overflow areas (both geometric mean and percent of time meeting single sample standard); projects underway to reduce overflows; and roles of the government agencies involved.
- **How Can We Reduce Overflows:** During this portion of the presentation, participants learned about the different technologies that the city analyzed for reducing

CITY OF INDIANAPOLIS

Clean Stream Program

REDUCING SEWAGE OVERFLOWS: YOUR INPUT NEEDED

- **Are you interested in reducing raw sewage overflows into our streams?**
- **How much are you willing to pay to solve this 100-year-old problem?**
- **Are smaller streams a higher priority than the White River?**



The City of Indianapolis is finalizing a plan to reduce raw sewage overflows into our rivers and streams, and we need your input. Five public meetings are scheduled to get citizen feedback on plans to overhaul the city's sewer infrastructure to reduce raw sewage overflows.

PUBLIC MEETING SCHEDULE

Thursday, October 14	Garfield Park Multipurpose Room	2450 S. Shelby St.	7:00 PM
Tuesday, October 19	Julia Carson Government Center, Rm A	300 E. Fall Creek Parkway, N. Drive	7:00 PM
Thursday, October 21	Christamore House Auditorium	502 N. Tremont	6:00 PM
Monday, October 25	Brookside Park Auditorium	3500 Brookside Parkway S. Drive	7:00 PM
Tuesday, October 26	Riviera Club	5640 N. Illinois Street	7:00 PM

If you can't attend one of these meetings, you can go to indycleanstreams.org from October 14-30 to learn about the options and provide your input.

The final plan will be subject to the approval of the U.S. Environmental Protection Agency and the Indiana Department of Environmental Management.

www.indycleanstreams.org
317.327.8720

City of Indianapolis DPW Department of Public Works

INDIANAPOLIS CLEAN STREAM TEAM

Figure 5-2
Public Meeting Invitation

overflows and improving water quality. This included in-system storage technologies, building new storage facilities or larger sewers, separating sewers, and expanding or building new treatment facilities. The general advantages and disadvantages of each technology were discussed. This portion of the presentation included showing samples of the city's treatment plant influent, primary effluent and final effluent. The presentation noted the need to make other improvements to improve water quality, including:

- Building sewers for neighborhoods now served by septic systems
- Implementing projects to reduce flooding and improve storm water drainage
- Restoring stream banks and removing polluted sediments from streams
- Disconnecting downspouts, sump pumps and other illegal connections that take up sewer capacity
- Adding flow to tributaries to improve stream appearance and wildlife habitat
- Improving oxygen levels in streams by adding fountains/aeration on Fall Creek and White River, removing Boulevard Dam on Fall Creek and modifying two dams on White River

- **The Options: Plans 1, 2, 3:** During this portion of the presentation, participants learned how the various technologies had been combined into three systemwide plan options by the city, with input from advisory committee members and review by U.S. EPA and IDEM. Key differences and similarities between Plan 1 and Plan 2 were described, using maps illustrating the plan options. The five different levels of control were presented and correlated to rainfall amounts for a 24-hour storm event. Participants reviewed a map showing the scope of sewer separation under Plan 3.

- **The Benefits and Costs – Comparing the Plans:** Participants were shown information comparing the plan options based upon their impacts on neighborhood concerns, reducing overflows, protecting human health and improving wildlife health. Participants received information on total plan costs, cost per gallon, and the average homeowner's monthly sewer rates at the end of 20 years to pay for CSO controls. **Figure 5-6** shows the information used to show the advisory committees' ranking of neighborhood issues. **Figure 5-7** shows the information used in the Stream Line newsletter and

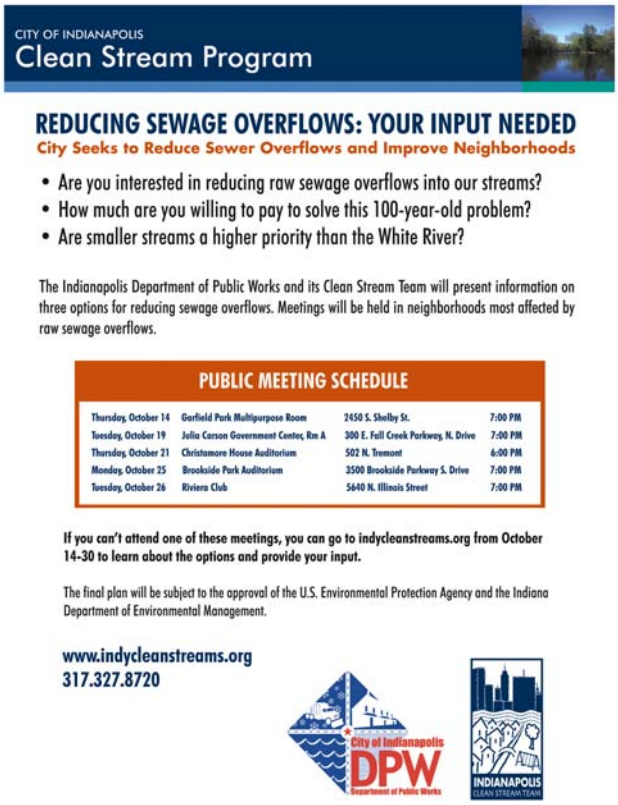


Figure 5-3
Public Meeting Flier

Figure 5-4
Public Meeting Display Advertisement

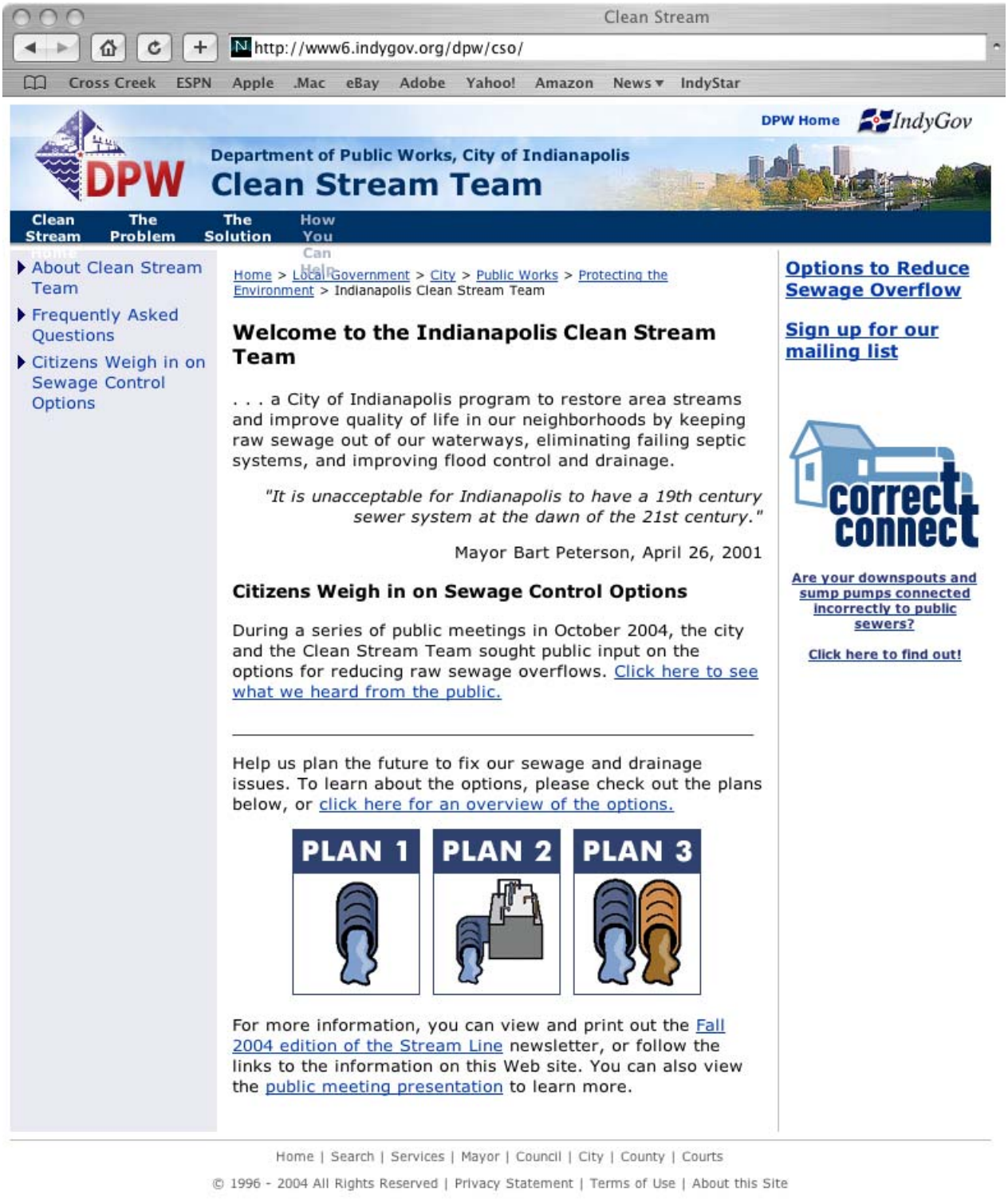


Figure 5-5
Clean Stream Team Website with CSO Control Options

PowerPoint presentation to compare the benefits and costs of the plan options.

Participants were given information on a plan suggested by U.S. EPA to evaluate different levels of control on some streams than others. The example provided was 2 overflows per average year on Fall Creek and Pogues Run and 3 overflows per average year on White River, Pleasant Run and Eagle Creek. The example was compared to the other systemwide plans using the table shown in **Figure 5-8**.

- **Priority Areas:** Participants were given a brief overview of the results of the city's stream use surveys, which indicated that the most popular activities are walking, jogging, bicycling, and playing by the stream banks. Less frequent activities are fishing, wading, and swimming. All waterways are used for recreation, including White River and smaller streams. However, with no swimming beaches or high-use water contact areas, the city has concluded that no one waterway is more important than another to the entire community.
- **Next Steps:** Participants were given a schedule for completion of the plan and also were invited to join the Clean Stream Team by signing a pledge card promising to participate in activities to protect city waterways.

After each general topic, participants were invited to ask questions. Those questions and related answers were posted to the Clean Stream Team Web site. During the presentation, participants were asked periodically to answer questions on the insert card in the Stream Line newsletter. The card, which was shown earlier in **Figure 5-1**, could either be turned in at the end of the meeting or mailed by October 30.

5.8.3 Public Outreach Results

The city received 153 response cards or Web site feedback forms through this public outreach program. Responses to each question on the response card are summarized below. The responses do not always add up to 153 because some respondents did not answer all the questions.

1. Neighborhood Impacts: Participants were asked to rank seven neighborhood issues in importance as they pertain to sewer repairs. Results are shown below in order of preference, with the average score for each choice (lower scores represent a higher ranking).

- **1st:** Odor during long-term operation (2.04 average)
- **2nd:** Siting issues, such as proximity of facilities to homes, parks and schools (3.39)

	PLAN 1	PLAN 2	PLAN 3
NOISE	1st	3rd	1st
ODOR	2nd	3rd	1st
SAFETY AND SECURITY	1st	3rd	1st
SITING CONCERNS	1st	2nd	2nd
AESTHETICS	1st	3rd	2nd
TRUCK TRAFFIC DURING OPERATION	1st	3rd	2nd
NEIGHBORHOOD DISRUPTION DURING CONSTRUCTION	1st	2nd	3rd
THE COMMITTEE'S OVERALL RANKING OF NEIGHBORHOOD ISSUES	1st	3rd	2nd

Figure 5-6
Ranking of Neighborhood Issues

	REDUCING OVERFLOWS			PROTECTING HUMAN HEALTH		IMPROVING WILDLIFE HEALTH	MANAGING COSTS		
	AVERAGE % OF FLOW CAPTURED AND TREATED ANNUALLY	AVERAGE # OF UNTREATED OVERFLOWS PER YEAR	ADDITIONAL GALLONS OF SEWAGE CAPTURED/TREATED PER YEAR	DAYS WATERWAYS ARE SAFE FOR SWIMMING (<235 *E. COLI* COLONIES/100 ml)	DAYS WATERWAYS HAVE VERY HIGH BACTERIA LEVELS (> 10,000)	AQUATIC AND WILDLIFE BENEFITS	TOTAL COST (CONSTRUCTION + OPERATIONS FOR 20 YEARS)	TOTAL COST PER GALLON OF OVERFLOW CAPTURED	AVERAGE HOMEOWNER'S MONTHLY SEWER RATES (AT END OF 20 YEARS)*
CURRENT CONDITIONS	63%	60	-	187 days	52 days	3RD	$0	-	$12.85
PLAN 1	90%	12	6.33 billion	230 days	12 days	1ST	$1.44 billion	22.8 cents	$44.00
	93%	6	6.86 billion	230 days	6 days		$1.61 billion	23.5 cents	$47.00
	95%	4	7.12 billion	230 days	4 days		$1.73 billion	24.3 cents	$49.00
	97%	2	7.46 billion	230 days	2 days		$2.21 billion	29.6 cents	$58.00
	99%	0.5	7.73 billion	231 days	0.5 days		$3.03 billion	39.2 cents	$73.00
PLAN 2	90%	12	6.35 billion	230 days	12 days	2ND	$1.55 billion	24.4 cents	$46.00
	94%	6	6.93 billion	230 days	6 days		$1.72 billion	24.8 cents	$49.00
	95%	4	7.16 billion	230 days	4 days		$1.86 billion	26.0 cents	$51.00
	98%	2	7.49 billion	230 days	2 days		$2.23 billion	29.8 cents	$58.00
	99%	0.5	7.73 billion	231 days	0.5 days		$3.03 billion	39.2 cents	$73.00
PLAN 3	100%	0	7.87 billion	228 days	0 days	2ND	$6.2 billion	78.8 cents	$132.00

*Monthly sewer rate estimates include today's rates plus the amount needed to fund sewage overflow projects. Other rate increases will be needed in future years to keep the rest of our system in good condition.

Figure 5-7
Comparison of Costs and Benefits of Systemwide Plan Options

- **3rd:** Noise in long-term operation (3.48)
- **4th:** Aesthetics: How facilities and improvements look in the neighborhoods (3.75)
- **5th:** Truck traffic during long-term operation (4.66)
- **6th:** Security issues, such as the possibilities of vandalism and sabotage (5.14)
- **7th:** Neighborhood disruption during construction (5.26)

The histograms in **Figure 5-9** break down the responses for each choice, showing how many participants gave each issue a 1 ranking, 2 ranking, and so on.

2. Environmental Benefits and Cost Impacts: Participants were asked to rank six choices that pertain to environmental benefits and cost impacts. Results are shown below in order of preference, with the average score for each choice shown in parentheses. There was very little variation between the top-ranking and bottom-ranking choices for this question.

- **1st:** Making waterways safer for people who use them (3.23 average)
- **2nd:** Reducing the number of gallons that overflow each year (3.31)
- **3rd:** Reducing the number of times that sewers overflow each year (3.48)
- **4th:** Keeping the cost per gallon reasonable and cost-effective (don't spend beyond the point of diminishing returns (3.49)
- **5th:** Making waterways healthier for fish and other wildlife (3.50)
- **6th:** Keeping sewer rates affordable for most families and businesses (3.69)

The histograms in **Figure 5-10** break down the responses for each choice, showing how many participants gave each issue a 1 ranking, 2 ranking, and so on.

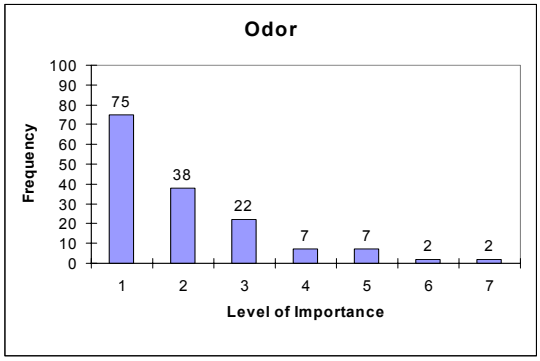
3. **Cost and Level of Control:** While long-term sewer rates are very difficult to predict, the city has estimated the impact on sewer rates from overflow control projects. Participants were asked, "At the end of 20 years, how much would you be willing to pay to clean our waterways?" The city provided future rate estimates that included current sewer rates plus the amount needed to fund sewer overflow projects at different levels of control. Results are shown in **Table 5-1**. The top vote-getter, with 40 percent of all votes, was $49-51 per month (95 percent systemwide capture).

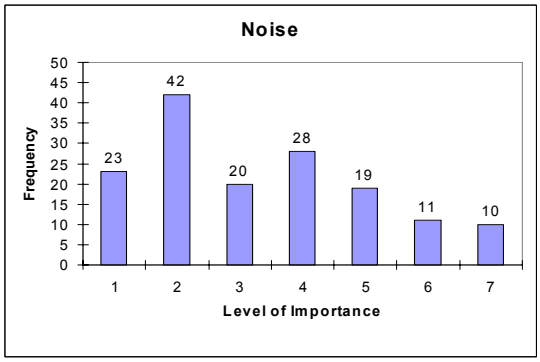
4. **Priority Areas:** In implementing the plan, the city could provide different levels of control for different streams, based upon their recreational use, cost-effectiveness of controls or importance to the community. Participants were asked to check one of four choices to express their opinion. Results are shown in **Table 5-2**. The most popular choice (receiving 38 percent of all votes) was "All streams should be treated the same." A large number of participants also wanted to give smaller streams a higher priority than White River (27 percent) and some streams a higher level of control because it is cost-effective to do so (22 percent).

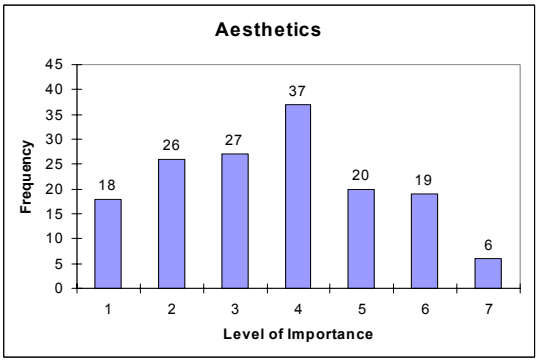
5. **Preferred Plan:** Participants were asked to indicate which systemwide plan they prefer. Eighty-five participants (59 percent of votes) preferred Plan 1 (Storage/Conveyance), 38 chose Plan 2 (Storage/Conveyance with Remote Treatment Facilities), and 22 chose Plan 3 (Total Sewer Separation).

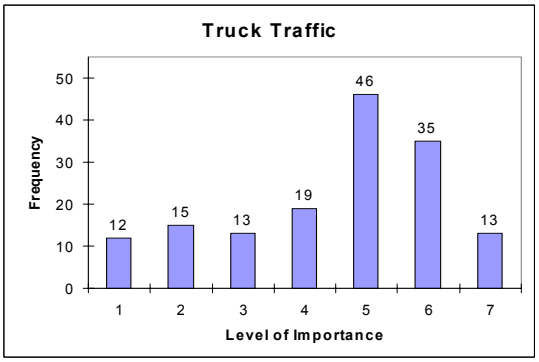
AVERAGE % OF FLOW CAPTURED AND TREATED ANNUALLY	AVERAGE # OF UNTREATED OVERFLOWS PER YEAR	ADDITIONAL GALLONS OF SEWAGE CAPTURED /TREATED PER YEAR	DAYS WATERWAYS ARE SAFE FOR SWIMMING (<235 E. COLI COLONIES/100 ML)	DAYS WATERWAYS HAVE VERY HIGH BACTERIA LEVELS (> 10,000 COLONIES/100 ML)	AQUATIC AND WILDLIFE BENEFITS	TOTAL COST (CONSTRUCTION + OPERATIONS FOR 20 YEARS)	TOTAL COST PER GALLON OF OVERFLOW CAPTURED	AVERAGE HOMEOWNER'S MONTHLY SEWER RATES (AT END OF 20 YEARS)
96%	3 OR 2	7.37 billion	230 days	3 OR 2 days	1ST	$2.05 BILLION	27.8 CENTS	$53-54

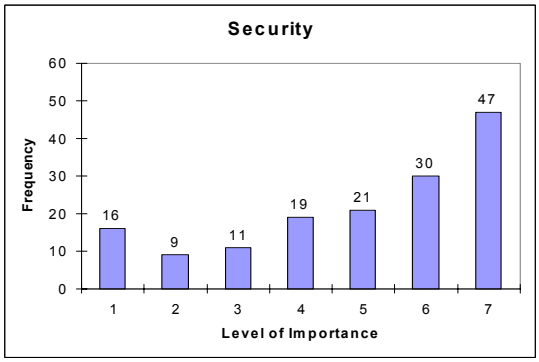
Figure 5-8
Comparison Costs and Benefits of U.S. EPA Suggested Plan











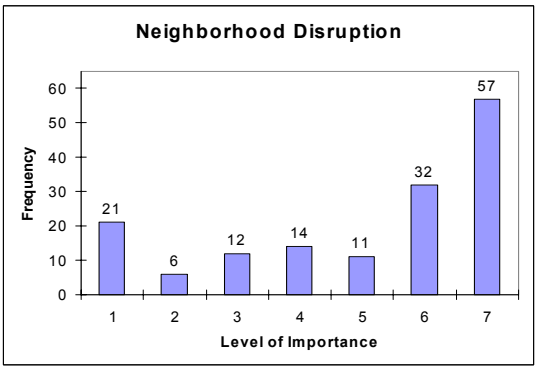
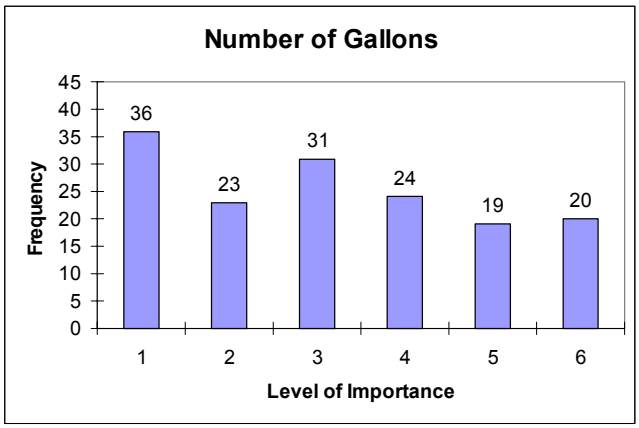
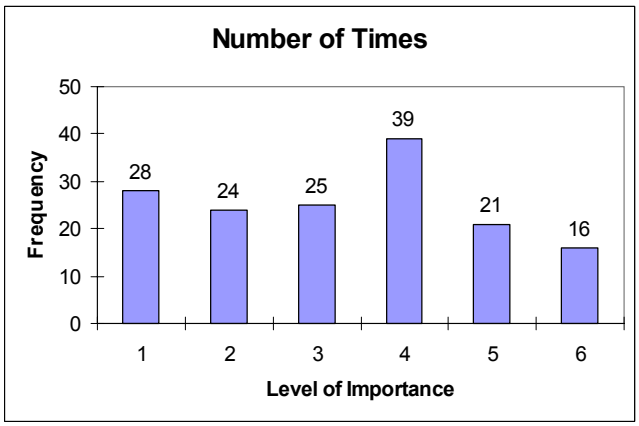
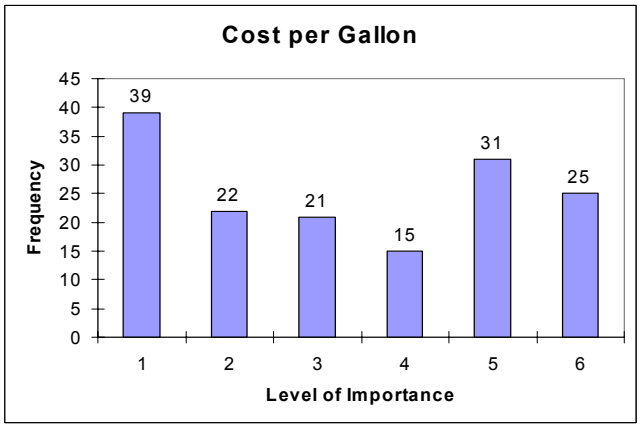
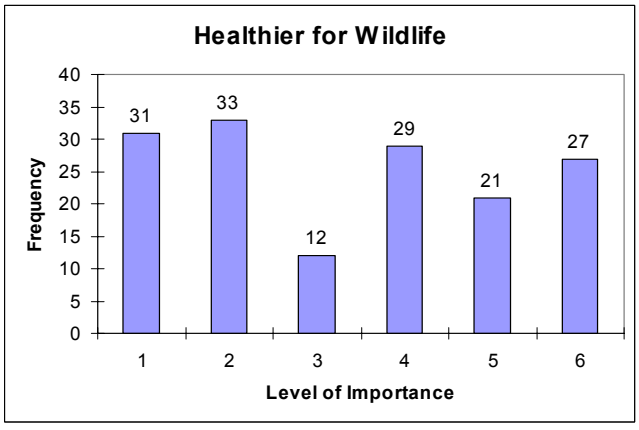


Figure 5-9
Neighborhood Impacts Histograms









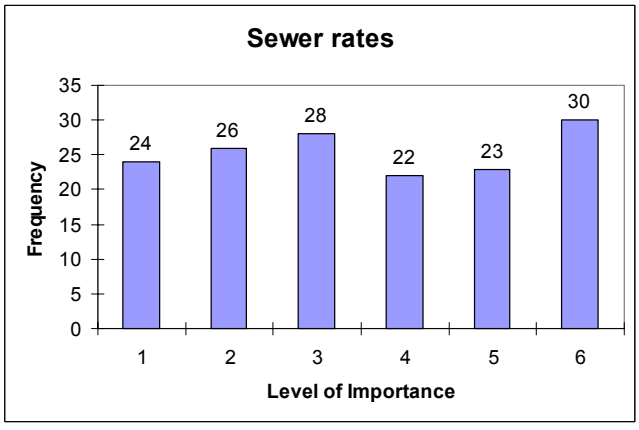


Figure 5-10
Environmental Benefits and Cost Impacts Histograms

Table 5-1
Question: At the end of 20 years, how much would you be willing to pay to clean our waterways?

Percent Capture	Average Homeowner's Monthly Sewer Rate at End of 20-years	Votes Received	Percent of Total
90%	$44-46	23	15%
93%	$47-49	12	8%
95%	$49-51	59	40%
97%	$58	20	13%
99%	$73	14	9%
100%	$132	6	4%
Other		15	10%

Table 5-2
Question: In implementing the plan, the city could spend more resources and place higher standards on some streams than others. What is your opinion?

Choice	Votes Received	Percent of Total
All streams should be treated the same	56	38%
Smaller streams should be a higher priority than the White River	40	27%
Some small streams should receive higher protection than other small streams	19	13%
Some streams should receive a higher level of control because it is cost-effective to do so	32	22%

5.8.4 Advisory Committees

The Clean Stream Team Advisory Committee advised the city on how to publicize the watershed meetings and present information in an understandable way. Following the meetings, advisory committee members were asked to review the public responses and provide their input on level of control. Most committee members favored the 95 percent capture option and also urged the city to address the septic conversion program along with CSOs. Some committee members favored a higher level of control. For complete committee comments, see **Appendix D** for the minutes of the November 17, 2004, meeting.

5.9 2006 Public Comment Period

5.9.1 Release of Plan for Public Comment

On July 19, 2006, Mayor Bart Peterson announced the city had reached a tentative agreement with state and federal agencies on a revised 20-year plan to greatly reduce raw sewage overflows into Marion County waterways, ensuring continued progress in improving the quality of life in many Indianapolis neighborhoods. The announcement was covered by The Indianapolis Star, all four local television news stations and four radio stations. The story also was carried by the Bureau of National Affairs' *Daily Environment Report*. The city's press release and samples of press coverage are included in Appendix D.

At the media event, the mayor also announced the beginning of a 30-day public comment period, which began July 19 and ended August 18. During the comment period, the plan was available for review on-line at www.indycleanstreams.org and in hard copy at all 26 Indianapolis-Marion County Public Library branches; the Department of Public Works office at 604 N. Sherman Drive; and the Indianapolis Clean Stream Team office at 151 N. Delaware, Suite 900. Electronic copies of the plan on CD-Rom also could be obtained by calling 317-327-8720. A copy of the flyer sent with the plan is included in Appendix D.

The city also mailed the 20-page executive summary to 1,564 individuals and organizations on the Clean Stream Team mailing list. Another 87 key stakeholders also received the executive summary and the full plan on CD-Rom. The city also distributed numerous copies of the CD-Rom and Executive Summary through meetings with neighbrhood groups, businesses and other interested parties. An email blast on the plan's availability was sent to 415 email addresses. The email blast and a sample cover letter are included in Appendix D. A special edition of the StreamLine newsletter was released the week of July 31 to announce the tentative agreement and public comment period. See Appendix D for a copy of the StreamLine newsletter.

5.9.2 Public Hearing & Comment Process

Twenty-seven people attended a public hearing at 7 p.m. on Thursday, August 3, at Good Hall on the University of Indianapolis campus, 1400 E. Hanna Ave. The hearing included a 25-minute presentation on the proposed plan. The city also provided fact sheets describing both the full plan and watershed-specific plans. Questions and comments about the plan were taken during the hearing. Of the five people who offered public comments, all spoke in support of the proposed plan. The city-owned cable television station, WCTY-TV, taped the hearing for rebroadcast on its two cable stations. The hearing sign-in sheet, agenda, fact sheets and transcript are included in Appendix D.

In addition to the hearing, the city accepted written comments on the plan on-line at www.indycleanstreams.org, via facsimile or U.S. mail. Twenty-three individuals or organizations commented in writing. A copy of all written comments and the city's response is included in Appendix D.

5.9.3 Summary of Comments and Responses

As noted above, all five of the official comments at the public hearing were in support of the plan. Fifteen of the 23 written comments supported the plan's adoption, as well. Three written comments opposed the plan, including a senior citizen who supported addressing the problem but opposed the plan's cost to ratepayers. The remaining five written comments were either neutral or asked specific questions without taking a position on the plan's adoption.
The comments the city received raised eight major issue areas, with some comment letters touching on multiple issues. The major issue areas were:

- Elimination of Overflows
- Septic Tank Elimination Program
- Public Notification of New Sewer Connections
- Use of Sanitary Sewer Funds
- Cost Concerns
- Water Conservation & Stormwater Management
- Use Attainability Analysis/Existing Use
- Technical Issues or Questions

A summary of the issues raised and the city's response is provided below:

Elimination of Overflows: Four comments expressed support for the complete elimination of all overflows or for going beyond the planned 95-97 percent capture level of control.

City Response: The city's plan will dramatically improve our rivers and streams and protect public health. The city's goals for the sewer plan are:

- Reducing sewer overflows when people are most likely to be in the streams,
- Improving our streams to support fish and other aquatic wildlife,
- Improving the quality of life in our neighborhoods by reducing odors and capturing the unsightly materials found in overflowing sewers, and
- Coming into compliance with state and federal Clean Water Act permit requirements.

Eliminating overflows through sewer separation is not required under the Clean Water Act and is not necessary to meet the above goals. In fact, because urban stormwater run-off is contaminated with a variety of pollutants, sewer separation is less environmentally beneficial than capturing a high level of combined sewage and conveying it to the advanced wastewater treatment plants. Overflows will only occur during very large storms when people aren't using the streams for recreation. Also, sewer separation is three times more expensive and would push residential sewer bills to unaffordable levels. This expense cannot be justified and would not produce better water quality conditions. During public outreach in October 2004, most residents preferred overflow control at the 95-97 percent capture level.

Septic Tank Elimination Program: Five comments requested that the city include its Septic Tank Elimination Program in a federal consent decree and/or complete the 18,000 septic conversion projects sooner than 20 years.

City Response: We agree that septic systems are a priority. Our Septic Tank Elimination Program is designed to address the worst neighborhoods and greatest public health threats first. However, septic tank elimination needs to be considered within the context of the city's many clean water infrastructure needs, including raw sewage overflows, sewer backups into streets and basements, treatment plant repairs, aging sewers needing rehabilitation, and fast-growing areas needing more sewer capacity. All pieces of the puzzle need to fit together. We need to ensure that solving a problem in one neighborhood doesn't transfer it to another area. Our 20-year schedule to eliminate 18,000 septic systems throughout Marion County is both appropriate and protective of public health. Furthermore, the city believes there is no legal justification for including the Septic Tank Elimination Program in a federal consent decree.

Public Notification of New Sewer Connections: Three comments asked the city to include in the plan and a federal consent decree its commitment to provide public notification of new sewer connections that might affect downstream capacity.

City Response: The Department of Public Works has made a commitment to provide to interested persons on a regular basis information on sewer connection applications that may affect downstream sewer capacity. However, it is not necessary to address this or any other city permit matter or ordinance in order to reach agreement with U.S. EPA on a consent decree relative to CSO discharges.

Use of Sanitary Sewer Funds: Four comments expressed concern that sanitary sewer funds had been borrowed upon to fund public safety needs. The comments asked that sanitary general funds be reserved exclusively for sanitary sewer and treatment needs.

City Response: Sanitary funds were recently approved to be loaned to Marion County to temporarily cover the cost of leasing 200 additional jail beds to address jail overcrowding and critical public safety needs. This loan, as approved in City-County Special Ordinance No. 5, 2006, must be repaid no later than June 30, 2007. This short-term loan will not affect our ability to deliver sewer improvement projects within the required schedule.

Cost Concerns: One comment came from a senior citizen who said she could not afford the projected $55-60 sewer bills and asked about state funding to help pay for projects.
City Response: The city sympathizes with these concerns and worked hard to protect ratepayers' interests during negotiations with state and federal regulators. It's important to point out that rates will rise gradually over 20 years. While cleaning up our streams is the right thing to do, we also have no choice but to meet requirements imposed by the U.S. Environmental Protection Agency and the Clean Water Act. We agree that state and federal funding should help pay for these projects. Unfortunately, at this time local ratepayers are being required to bear the burden. While the state and federal governments offer low-interest loans for sewer projects, funding for those programs has been reduced dramatically in recent years. Federal grants, once widely available through a construction grants program, are now only available through Congressional "earmarks" on federal spending bills. Many local, state and national organizations are working with Congress to create a federal trust fund for clean water infrastructure, much as we now have federal trust funds for highways and airports. To learn more about this issue, visit www.cleanwateramerica.org. The city will pursue any alternative funding options that may become available in order to lessen the burden on ratepayers.

Water Conservation & Stormwater Management: One comment asked the city to encourage water conservation and to use constructed wetlands or rain gardens to slow the flow of stormwater into the sewer system.

City Response: The city agrees that water conservation measures and improved stormwater management are important elements to improved water quality and water resource management. For this reason, the city requires property owners disturbing more than a half-acre of land in the combined sewer area to install stormwater best management practices (i.e., wetlands, stormwater drainage swells, etc.) as part of their development project. By requiring BMPs within the combined sewer area, the city has exceeded its stormwater permit requirements and demonstrated its resolve to better control stormwater runoff in order to mitigate combined sewer overflows. Our analysis of long-term sewer overflow solutions did not rely on these efforts, however, because water conservation, rain garden programs and similar approaches require voluntary efforts by property owners with benefits that cannot be guaranteed. This does not preclude the city from encouraging water conservation and better stormwater management as it implements the long-term plan.

Use Attainability Analysis/Existing Use: Two comments questioned the city's analysis of existing use under the Use Attainability Analysis. In particular, they questioned

whether a recreational use is an "existing use" if people are known to use the waters for recreation. One comment said actual use is not relevant to the determination of an "existing use" and the other comment took the opposing view, saying actual use is relevant.

City Response: The city has worked with IDEM to achieve a decision on the interpretation of "existing use," which is concept written in federal regulations to protect waterways that have "actually attained" a beneficial use. On June 27, 2005, IDEM issued a letter to the city agreeing that there are no existing uses that would preclude a refinement of the designated recreational use during severe wet-weather events and resultant CSOs. The text in the long-term control plan merely summarizes the existing use submittal presented to IDEM and the agency's decision. IDEM's decision enabled the city to move forward with a Use Attainability Analysis to determine what recreational uses can be attained on CSO-impacted waterways. The UAA also will go through a public comment and review process before the designated recreational use can be modified. We look forward to working with IDEM, EPA and interested stakeholders during this process.

Technical Issues or Questions: Six written comments asked about the plan's benefits to specific streams or neighborhoods or raised questions about technical details of the plan.

City Response: The city provided residents with information on specific streams and neighborhoods to answer the questions they raised. The response to these and other issues is included in Appendix D.

5.10 Future Public Participation

5.10.1 Introduction

As noted earlier, the City of Indianapolis believes strongly in the value of public participation and is committed to continuing to seek public input during the planning, design and construction of CSO control projects. Future public participation will continue to educate citizens about sewage overflows and water quality problems; seek public input into specific project options; inform neighborhood residents before, during and after construction; continue to notify residents of sewer overflow events; and report on the city's progress in reducing sewage overflows and improving water quality.

5.10.2 Clean Stream Team Advisory Committee

The city's Clean Stream Team Advisory Committee will continue to meet regularly to provide independent advice on technical and policy issues associated with CSO control planning and implementation.

5.10.3 Neighborhood Communication

During the implementation of the long-term control plan, the city plans to continue to keep residents informed of construction progress and water quality improvements. During construction, the city will communicate with neighborhood residents and businesses on the construction schedule and work being conducted in their neighborhood to minimize negative impacts on day-to-day activities.

As it did in October 2000 and January 2001, the city will continue to provide CSO program updates through sewer bill inserts. The city also will keep residents and businesses informed of water quality progress through the news media, public meetings, and presentations to neighborhood groups and stakeholders who are interested.

5.11 Summary

Citizens will both enjoy the benefits of improved water quality and be required to pay the costs of controlling CSOs and other pollution sources. For this reason, the city has made significant investments in involving the public in long-term control plan decision-making, beginning in 1996 and expanding in 2000 and beyond. These programs have included:

- Formation of two advisory committees on CSO-related issues (consolidated in 2002 into one committee)
- Stream use surveys and neighborhood outreach meetings to gather information on how residents use CSO-impacted waterways
- The state's first public notification program for CSO overflows
- Clean Stream Team program fact sheets, quarterly newsletter, Web site, neighborhood signage for construction sites, outreach to schools and media events to publicize CSO control projects
- Production of an educational video on CSO issues and speaking engagements with interested community organizations
- Watershed-based meetings in October 2004 to review CSO control alternatives and obtain citizen input into

preferred technologies, level of control, rate impacts and stream priorities
- Public comment period on a draft long-term control plan in July-August 2006

The city's plan has been influenced significantly by the input of advisory committee members and the general public. Both the public and key stakeholders have been given an opportunity to comment on CSO control alternatives, stream prioritization and assumptions used in developing the plan. In addition, the city consulted advisory committee members, environmental advocacy groups, downstream communities and the general public during its survey of recreational uses of the White River and tributaries in CSO-impacted areas.

Further documentation of the city's public outreach process can be found in **Appendix D**.

Public comments received in October 2004 were used in selecting the final long-term control plan. The preferred level of control among respondents was 95 percent capture, receiving 40 percent of the votes cast. When asked whether the city should treat all streams equally or give some streams a higher priority than others, 38 percent of respondents said all streams should be treated the same, compared to 27 percent who would give smaller streams a higher priority than White River, and 22 percent who would give some streams a higher level of control if it is cost-effective. Fifty-nine percent of respondents preferred the storage/conveyance alternative (Plan 1). Similarly, most members of the city's advisory committees favored the 95 percent capture option and the storage/conveyance alternative.

The city solicited public comment on a draft long-term control plan prior to its finalization and submittal to the federal and state governments. Public comments were overwhelmingly in support of the plan as proposed. The city will continue to involve the public and advisory committees during the planning, design and construction of CSO control projects.